

Page 112

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PENDLETON DIVISION

OREGON FIREARMS FEDERATION,)	
INC., et al.,)	
)	Civil No.
Plaintiffs,)	2:22-cv-01815-IM
)	(Lead Case)
v.)	
)	Civil No.
TINA KOTEK, et al.,)	3:22-cv-01859-IM
)	(Trailing Case)
Defendants.)	
)	Civil No.
)	3:22-cv-01862-IM
(Continued))	(Trailing Case)
)	
)	Civil No.
)	3:22-cv-01869-IM
)	(Trailing Case)
)	

* VIDEOCONFERENCE *

VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION
OF

KEVIN L. CAMPBELL, VOLUME II

Witness located in:

Salem, Oregon

* All participants appeared via videoconference *

DATE TAKEN: May 17, 2023
REPORTED BY: Tia B. Reidt, Washington RPR, CCR #2798
Oregon # 22-0001

Page 114

APPEARANCES

For Oregon Firearms Federation:

SHAWN M. LINDSAY
JURISLAW LLP
Three Centerpointe Drive, Suite 160
Lake Oswego, OR 9703
(503) 596-2928
Shawn@jurislawyer.com

For the State of Oregon Defendants:

HANNAH HOFFMAN
MARKOWITZ HERBOLD
1455 SW Broadway, Suite 1900
Portland, OR 97201
(503) 972-5076
HannahHoffman@markowitzherbold.com

For the Witness:

C. AKIN BLITZ
BULLARD LAW
200 SW Market Street, Suite 1900
Portland, OR 97201
(503) 248-1134
Ablitz@bullardlaw.com

Videographer:

MICHAEL HENRY
BUELL REALTIME REPORTING
1325 Fourth Avenue, Suite 1840
Seattle, WA 98101
(206) 287-9066
Info@buellrealtime.com

* * * * *

Page 202

1 take the microphone.

2 THE WITNESS: Okay.

3 MR. LINDSAY: I can go ahead, Akin?

4 MR. BLITZ: Your transition -- your
5 transition took so little time that I was going to
6 interrupt Hannah with my musings around the sheriff's
7 office, Gold Beach, in Brookings.

8 MS. HOFFMAN: Oh, well, go ahead.

9 MR. BLITZ: So it's a really interest- --
10 in the context of Kevin's testimony -- and I do have
11 questions, but not about that part -- home is a really
12 good illustration of some of the challenges that could
13 arise based on home.

14 MS. HOFFMAN: Yes.

15 MR. BLITZ: Go ahead, Shawn.

16 MR. LINDSAY: All right. Thank you. I'll
17 try to be efficient here.

18

19 EXAMINATION

20 BY MR. LINDSAY:

21 Q. So, Mr. Campbell, you have heard that Senate
22 Bill 348 -- right? It's in the Ways and Means
23 Committee, currently. It intends to amend 114. It
24 increases the waiting period from 30 days to 60 days.
25 Why do you think that is?

1 A. I think our technical perspective was that 30
2 days was not enough time.

3 Q. Thank you.

4 It also increased the --

5 A. (Speaking simultaneously.)

6 Q. It also increases the fee. Why?

7 A. The fee was not adequate to cover the cost.

8 So the -- you know, like I mentioned before, for a
9 local agency, \$100-plus is where the local agency cost
10 probably falls. And then, of course, the state police
11 does incur a cost in order to do their work. And I
12 don't know the exact amount, but around 46-plus dollars
13 per background check that they do.

14 Q. It also institutes a much longer waiting
15 period or longer period of time to implement the
16 permit-to-purchase regime. Why?

17 A. Yeah. So although, technically, agencies
18 would be capable, there's a lot of groundwork and
19 requirements that agencies have to work through to be
20 able to do this work including working with their local
21 budgeting authorities to even make sure that they've
22 got money and resources to do this. That is all a
23 process. Right?

24 It takes time, getting the equipment. The
25 Live-Scan machines, for instance, are a grant-based

Page 204

1 opportunity through OSP. So we're pursuing that for
2 agencies, but it all takes time.

3 I mean -- and if you launched a program today,
4 you would have chaos because you have people that have
5 a rightful expectation that they can get a permit and
6 they can purchase a firearm. And the -- and the --
7 we're -- we just -- our agencies, for a lot of good
8 reasons, don't have all of those pieces in place.

9 Q. Ms. Hoffman walked you through the process
10 just a few minutes ago, and you qualified all of your
11 answers with a lot of "ifs." So here is my "if."
12 Okay?

13 If 114 went into effect today, is the
14 permit-to-purchase regime ready to process
15 permit-to-purchase applications for every single
16 Oregonian that would submit an application that day?

17 A. No.

18 Q. A couple weeks ago, I spoke with Oregon State
19 Police, Ms. Landers. She told me that she would have
20 to hire at least 20 people to manage the
21 permit-to-purchase regime. She also said the Oregon
22 State Police has received no money to do so.

23 Does that cause you concern about the Oregon
24 State Police's ability to implement and manage the
25 permit-to-purchase regime?

Page 205

1 A. It does. And we have talked to State Police
2 about that. I mean, they had a fiscal request that
3 goes with Senate Bill 348. It's one of the reasons,
4 among many, that -- it's in the Ways and Means
5 Committee right now, is that funding is necessary for
6 OSP to do their part of the work.

7 Q. You said that if you had all of the resources
8 in the world, that permit agents would be able to
9 implement permit-to-purchase regime. How long would it
10 take to implement?

11 A. I have no idea. You mean if you gave us all
12 of the resources today and said, "Set this up"? I
13 don't have an answer for that, but it would take quite
14 a bit of time to get everything in place. Again,
15 you're -- especially -- there is a workforce piece of
16 this that is necessary to do this work.

17 And I'm pretty confident that most agencies do
18 not have that workforce in place. So it's recruitment
19 and hiring and training. There's just a lot of pieces
20 that have to be in place.

21 So I think one of the reasons that the
22 legislature, even though this bill has not passed, was
23 looking at a delayed period of time was so that there
24 would be certainty for agencies in terms of how long
25 they would have to try to figure this out, realizing

Page 226

C E R T I F I C A T E

STATE OF WASHINGTON

COUNTY OF PIERCE

I, Tia Reidt, a Certified Court Reporter in and for the State of Washington, do hereby certify that the foregoing transcript of the deposition of Kevin L. Campbell, having been duly sworn, on May 17, 2023, is true and accurate to the best of my knowledge, skill and ability. Reading and signing was requested pursuant to FRCP Rule 30(e).

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 19th day of May, 2023.



/S/ Tia B. Reidt
Tia B. Reidt, RPR, # 22-0001
NOTARY PUBLIC, State of
Washington.
My commission expires
5/15/2026.